

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : **Chapter 11**  
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RUDOLPH W. GIULIANI : **Case No. 23-12055 (SHL)**  
a/k/a RUDOLPH WILLIAM GIULIANI, :   
:   
Debtor. :   
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**SUPPLEMENTAL DECLARATION  
OF ERIK LAYKIN IN SUPPORT OF THE  
APPLICATION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF RUDOLPH W. GIULIANI TO  
RETAIN AND EMPLOY GLOBAL DATA RISK LLC AS SPECIALIZED  
FORENSIC FINANCIAL ADVISOR, EFFECTIVE AS OF FEBRUARY 9, 2024**

I, Erik Laykin, under penalty of perjury, declare as follows:

1. I am the chief executive officer of Global Data Risk LLC (“Global Data Risk”).

Global Data Risk’s business address is 14 Wall Street, 20th Floor, New York, NY 10005.

2. I am duly authorized to make this supplemental declaration (the “Supplemental Declaration”) on behalf of Global Data Risk in support of the *Application of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to Retain and Employ Global Data Risk LLC as Special Forensic Financial Advisor, Effective as of February 9, 2024* [Docket No. 150] (the “Application”).<sup>1</sup>

3. On March 20, 2024, the Committee filed the Application, together with, among other things, the *Declaration of Erik Laykin in Support of the Application of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to Retain and Employ Global Data Risk LLC as Special Forensic Financial Advisor, Effective as of February 9, 2024* (the “Initial Declaration”), which was attached to the Application as Exhibit B and is incorporated herein by reference.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Application.

4. I submit this Supplemental Declaration in further support of the Application. Except as otherwise noted, all facts in this Supplemental Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents and information supplied to me by my colleagues at Global Data Risk.

5. As stated in the Initial Declaration, Global Data Risk's business address is 14 Wall Street, 20th Floor, New York, NY 10005. However, Global Data Risk has part-time and full-time team members in numerous disparate locations, and those individual employees will provide services to the Committee in this chapter 11 case. Global Data Risk does not have any affiliates.

6. Paragraph 8 of the Initial Declaration states that Global Data Risk has undertaken a review of its conflicts database, which contains the names of clients and other parties interested in particular parties. For the avoidance of doubt, Global Data Risk's conflicts database is a single database that encompasses all of Global Data Risk's clients and matters.

7. Global Data Risk currently does not anticipate potential additional resources will be required in connection with its representation of the Committee. Nevertheless, as stated in paragraph 13 of the Initial Declaration, to the extent that any third-party resources outside of the existing Global Data Risk team are required to be deployed by Global Data Risk at the direction of the Committee, market rates will apply, and Global Data Risk will not charge a markup with respect to any such amounts billed. For the avoidance of doubt, such "third-party resources" refer to third-party vendors. These third-party vendors will only be engaged for services that Global Data Risk is not able to perform internally.

8. Paragraph 11 of the Application describes certain parties that will be working on this matter. Brian Ebert will be working on this matter and is a former Secret Service senior

executive who served as Chief of Staff of the Secret Service during the Trump administration and has experience in transnational financial crimes and money laundering investigations.

9. Paragraph 9 of the Initial Declaration discloses Global Data Risk's representation of the Interested Parties. Global Data Risk previously worked at the direction of Akin representing an Akin client (which client, for the avoidance of doubt, is not an Interested Party) in a matter that concluded in 2023 and which was unrelated to this chapter 11 case. With the exception of the foregoing, Global Data Risk does not represent, and has not in the past three years represented, any of the Interested Parties, whether in connection with this chapter 11 case or otherwise. Global Data Risk may in the future be engaged by Akin or other law firms associated with this chapter 11 case on matters unrelated to this chapter 11 case. For the avoidance of doubt, Global Data Risk is not, and has not in the past three years, been retained by Buchalter or US Dominion, Inc.

10. Paragraph 12 of the Initial Declaration sets forth the standard hourly rates for various roles and titles at Global Data Risk, including an hourly rate for employees with an "Administrative" title. Global Data Risk will not charge for services performed by "Administrative" employees.

11. To the best of my knowledge, Global Data Risk remains disinterested under the Bankruptcy Code and continues to have no adverse interest under Bankruptcy Code section 1103(b).

12. To the extent that Global Data Risk needs to update the information disclosed herein, Global Data Risk will disclose such information by filing an additional supplemental declaration.

I declare under penalty of perjury that the foregoing is true and correct on this 16th day of April, 2024.

/s/ Erik Laykin

Name: Erik Laykin